

EXHIBIT 6

From: [Todd Gregorian](#)
To: [Michael Bubman](#)
Cc: [Christopher Lavin](#); [Alan Mirman](#); [Baratz, Michael](#)
Subject: RE: Europlay Capital Advisors, LLC, et al. v. PersonalWeb Technologies, LLC (No. 21VECV00575, Super. Ct., Cnty. of L.A.)
Date: Friday, February 4, 2022 7:12:46 PM

Michael,

Amazon's position is that dissipating cash on hand on speculative patent litigation is not marshalling the PersonalWeb assets on behalf of all creditors, it is prioritizing the Insiders' claims over Amazon's interests, and doing so in a way that most likely cannot be undone. Thus the reason for the writ. If you review the rest of the brief that you cited in the email below, you will see that Amazon has no objection to the receiver pursuing those lawsuits but *only after* Amazon's judgment has been secured through appropriate means, such as a supersedeas bond. I understand from your confirmation that without the writ, the receiver intends to continue dissipating cash out of the estate. Thank you for clarifying the receiver's position.

My colleague Mr. Lavin below requested that you provide copies of all past and future monthly receiver reports. These are a required duty of the receiver; there should be at least eight such reports prepared already; and the PersonalWeb Insiders have represented to the Court of Appeal that even as a non-party creditor Amazon is entitled to them and to object to any of the actions they reflect. You did not respond to that request—please do so, either by providing all such reports or the receiver's reason for refusing to do so.

Please also confirm immediately whether, as part of his duty to preserve the collateral or otherwise, the receiver is directing PersonalWeb's counsel Stubbs Alderton and MoloLamken and their conduct in the federal court proceedings (and what date he first assumed that role if so)—or if instead he is allowing Mr. Weiss and Mr. Bermeister or other principals of PersonalWeb to continue to manage that part of the estate in violation of the Superior Court's orders.

Both you and PersonalWeb's litigation counsel have on multiple occasions threatened contempt sanctions against Amazon, so let me address that issue directly. Amazon has the utmost respect for the authority of the Superior Court. But your and PersonalWeb's threats are meritless---an attempt to misuse the Court's authority to protect the Insiders' interests and prevent a legitimate creditor from having its claim to priority heard. Since we have received these threats over the course of five months, I suspect you are already well aware that Amazon has not violated the Court's order. The only actions Amazon has taken thus far are to seek the writ mentioned above and to ask the federal court to clarify whether PersonalWeb must comply with *discovery orders* that first issued before the receivership was created and to which PersonalWeb raised *no objections* based on the receivership in later hearings concerning its violation of those orders. None of that violates a word of the injunction. Moreover, Amazon attempted to intervene and submit to the Superior Court's jurisdiction; for the time being the Court has refused that request and instead instructed Amazon to take other actions, such as filing a lien, that indicate the injunction does not apply to it.

We await your production and confirmations.

Thank you,

Todd Gregorian

[Fenwick](#) | Partner | +1 415-875-2402 | tgregorian@fenwick.com | Admitted to practice in California.

From: Michael Bubman <mbubman@mbn.law>
Sent: Friday, February 4, 2022 6:28 PM
To: Christopher Lavin <CLavin@fenwick.com>; Alan Mirman <amirman@mbn.law>
Cc: Todd Gregorian <TGregorian@fenwick.com>
Subject: RE: Europlay Capital Advisors, LLC, et al. v. PersonalWeb Technologies, LLC (No. 21VECV00575, Super. Ct., Cnty. of L.A.)

**** EXTERNAL EMAIL ****

Mr. Lavin:

In response to your request, there are several things that I can confirm:

- I will confirm our recent telephone conversation in which I asked why you had never responded to my correspondence to you and Todd Gregorian dated September 2, 2021 regarding the impact of the State Court injunction, which you appear content to violate without advising the State Court of your actions;
- I will confirm that in our recent telephone conversation, you refused to respond to my question about whether you had made any effort to advise the State Court of the things you were saying to the District Court about the State Court Action, including your assertion that “the Receivership is fraudulent”;
- I will confirm that your request below (that the Receiver not make any payments out of PersonalWeb Technologies, LLC estate) is far broader than your request in the Motion to Stay (“To be clear, Amazon seeks a limited stay precluding the entry of the stipulated judgment (or any judgment), or disbursement of any assets to Insiders, pending Amazon’s appeal. Amazon does not seek a stay of other activities of by the Receiver, such as the Receiver taking prudent steps to marshal assets for the benefit of all creditors or requesting receiver’s certificates). I will simply point you to pages 4-5 of your Motion for a Stay filed with the State Court.

As for your request that the Receiver not make any payments out of the PersonalWeb Technologies, LLC, the Receiver will respectfully decline. The Receiver will continue to perform the functions for which he was appointed by the Los Angeles Superior Court. Your continued refusal to even acknowledge the State Court will leave the Receiver no alternative but to seek an order from the State Court with respect to your actions violating the State Court’s preliminary injunction.

Best regards,

Michael



Mirman, Bubman & Nahmias, LLP

21860 Burbank Blvd., Suite 360
Woodland Hills, California 91367-7406
Tel. No.: (818) 451 – 4600
Fax No.: (818) 451 – 4620
www.mbn.law
mbubman@mbn.law

Please take note that my email address has changed

From: Christopher Lavin <CLavin@fenwick.com>
Sent: Thursday, February 3, 2022 3:51 PM
To: Alan Mirman <amirman@mbn.law>; Michael Bubman <mbubman@mbn.law>
Cc: Todd Gregorian <TGregorian@fenwick.com>
Subject: Europlay Capital Advisors, LLC, et al. v. PersonalWeb Technologies, LLC (No. 21VECV00575, Super. Ct., Cnty. of L.A.)

Counsel,

We write on behalf of our clients Amazon.com, Inc., Amazon Web Services, Inc., and Twitch Interactive, Inc. (collectively, “Amazon”) in the above-captioned matter to request that the receiver not make any further payments out of the PersonalWeb Technologies, LLC estate (“PersonalWeb”) until the appellate court resolves Amazon’s pending motion for a stay. (Attached.) Please confirm.

Furthermore, as Amazon holds a lien against PersonalWeb, pursuant to California Rule of Court 3.1182(a), we request copies of all past and future monthly receiver reports.

Regards,
Chris

Chris Lavin
[Fenwick](http://Fenwick.com) | Associate | +1 415-875-2287 | CLavin@fenwick.com | Admitted to practice in California.